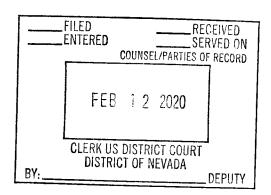
Rene L. Valladares
Federal Public Defender
Nevada State Bar No. 11479
Erin Gettel
Assistant Federal Public Defender
Nevada State Bar No. 13877
411 E. Bonneville, Ste. 250
Las Vegas, Nevada 89101
(702) 388-6577
Erin Gettel@fd.org



Attorney for Kenneth Moore

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

United States of America,

Plaintiff,

V.

Case No. 2:19-mj-00363-VCF

Stipulation to Continue Preliminary
Hearing
(Fifth Request)

Case No. 2:19-mj-00363-VCF

The parties jointly request that this Court vacate the preliminary hearing scheduled for February 13, 2020, and continue it for at least 45 days because:

- 1. The government intends on making an early production of discovery to the defendants in an effort to reach a pre-indictment plea agreement and lab test results remain outstanding. The government intends to disclose more discovery as it becomes available, and defense counsel will need time to review this discovery and discuss it with their clients.
- 2. A pre-indictment plea agreement would obviate the need for either a preliminary hearing or indictment by a grand jury.
 - 3. Defendants are not incarcerated and do not object to a continuance.

- 4. Denial of this continuance would potentially prejudice the defendants and the government and would unnecessarily consume this Court's valuable resources.
- 5. Additionally, denial of this continuance could result in a miscarriage of justice. The additional time is excludable in computing the time within which the trial must commence under the Speedy Trial Act, 18 U.S.C. 3161(h)(7)(A), considering the factors under § 3161(h)(7)(B)(i), (iv).

DATED: February 10, 2020.

Rene L. Valladares Federal Public Defender

Counsel for Latoya Jones

Nicholas A. Trutanich United States Attorney

/s/ Erin Gettel
By
Erin Gettel Assistant Federal Public Defender
/s/ Chris T. Rasmussen
By
Chris T. Rasmussen

/s/ Shaheen Torgoley
By
Shaheen Torgoley
Assistant United States Attorney

UNITED STATES DISTRICT COURT **DISTRICT OF NEVADA**

United States of America, Plaintiff,

ν.

Kenneth Moore and Latoya Jones,

Defendant.

Case No. 2:19-mj-00363-VCF

Order Granting Fifth Stipulation to **Continue Preliminary Hearing**

Based on the Stipulation of counsel and good cause appearing,

IT IS ORDERED that the preliminary hearing currently scheduled on February 13, 2020, at 4:00 p.m. is vacated and continued to $\frac{April 3,2020}{2020}$ at the hour of $\frac{4}{2}$: 0P.m. Cowtroom 3D.

DATED this 12 may of February, 2020.

CAM FERENBACH UNITED STATES MAGISTRATE JUDGE